

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:**

\*

**MIDNIGHT MADNESS DISTILLING, LLC,**

\*

**Case No. 21-11750-MDC  
Chapter 11**

**Debtor.**

\*

\* \* \* \* \*

**NOTICE OF MOTION OF MILLSTONE SPIRITS GROUP, LLC TO  
ENFORCE TERMS OF SALE ORDER AND TERMS OF NON-RESIDENTIAL  
REAL PROPERTY LEASE ASSUMED AND ASSIGNED UNDER SALE  
ORDER, RESPONSE DEADLINE AND HEARING DATE**

Millstone Spirits Group, LLC ("Millstone"), by and through its undersigned counsel, has filed a Motion to Enforce Terms of Sale Order and Terms of Non-Residential Real Property Lease Assumed and Assigned under Sale Order (Dkt. No. 248), which seeks to enforce the terms of the sale order and a non-residential real property lease with Finland Leasing Co., which was assumed by Millstone.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before **January 13, 2022, you or your attorney must file a response to the Motion.** (see Instructions on next page).
3. **A hearing on the Motion** is scheduled to be held telephonically on **January 26, 2022, at 11:30 a.m.** before the United States Bankruptcy Court. **The dial in number for the hearing is 877-336-1828, access code 7855846.** Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. A copy of the Motion was previously mailed to you. A further copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1,** you must file your response electronically.
8. **If you are not required to file electronically,** you must file your response at:  
  
U.S. Bankruptcy Court for the Eastern District of Pennsylvania  
900 Market Street, Suite 400  
Philadelphia, PA 19107
9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Patricia B. Jefferson  
Miles & Stockbridge P.C.  
100 Light Street, 10th Floor  
Baltimore, Maryland 21202  
Tel: (410) 385-3406  
Fax: (410) 698-1354  
Email: pjefferson@milesstockbridge.com

and to counsel for the Chapter 7 Trustee at:

John T. Carroll, III  
Cozen O'Connor  
One Liberty Place  
1650 Market Street Suite 2800  
Philadelphia, PA 19103  
Tel: (302) 295-2028  
Fax : (215) 701-2140  
Email: jcarroll@cozen.com

DATE: December 29, 2021

Respectfully submitted:

/s/ Joel L. Perrell Jr.

Joel L. Perrell Jr (PA Bar No. 204803)  
Patricia B. Jefferson (*Admitted Pro Hac Vice*)  
Miles & Stockbridge P.C.  
100 Light Street, 10<sup>th</sup> Floor  
Baltimore, Maryland 21202  
Tel: (410) 385-3406  
Fax: (410) 698-1354  
Email: pjefferson@milesstockbridge.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 29, 2021, a true and correct copy of the foregoing Notice of Motion of Millstone Spirits Group, LLC to Enforce Terms of Sale Order and Terms of Non-Residential Real Property Lease Assumed and Assigned Under Sale Order was served via this Court's CM ECF system upon:

- **WILLIAM J. BURNETT** william.burnett@flastergreenberg.com, william.burnett@ecf.inforuptcy.com;jennifer.vagnozzi@flastergreenberg.com;jeanne.valentino@flastergreenberg.com
- **KEVIN P. CALLAHAN** kevin.p.callahan@usdoj.gov
- **JULIE A. CALLSEN** julie.callsen@tuckerellis.com, brittany.falkner@tuckerellis.com;thomas.fawkes@tuckerellis.com
- **JOHN T. CARROLL** jcarroll@cozen.com, jdeeney@cozen.com;pgiordano@cozen.com;john-carroll-2735@ecf.pacerpro.com
- **TURNER N. FALK** turner.falk@obermayer.com, coleen.schmidt@obermayer.com
- **BONNIE B. FINKEL** finkeltrustee@comcast.net, NJ69@ecfbis.com;Finkeltrustee@comcast.net
- **HOWARD GERSHMAN** hg229ecf@gmail.com, 229ecf@glpoc.comcastbiz.net
- **HARRY J. GIACOMETTI** harry.giacometti@flastergreenberg.com, harry.giacometti@ecf.inforuptcy.com;jennifer.vagnozzi@flastergreenberg.com;giacometti.flastergreenberg@gmail.com;jeanne.valentino@flastergreenberg.com
- **MATTHEW A. HAMERMESH** mhamermesh@hangley.com, ecffilings@hangley.com;kem@hangley.com;mjl@hangley.com
- **MEGAN N. HARPER** megan.harper@phila.gov, Edelyne.Jean-Baptiste@Phila.gov
- **JEFFREY KURTZMAN** Kurtzman@kurtzmansteady.com
- **JENNIFER L. MALESKI** jmaleski@dilworthlaw.com, mdolan@dilworthlaw.com;cchapman-tomlin@dilworthlaw.com
- **MICHAEL G. MENKOWITZ** mmenkowitz@frof.com, brian-oneill-fox-5537@ecf.pacerpro.com;jdistanislao@foxrothschild.com
- **CAROL E. MOMJIAN** cmomjian@attorneygeneral.gov
- **JOEL L. PERRELL** jperrell@MilesStockbridge.com
- **EVERETT K. SHEINTOCH** esheintoch@sheintochlaw.com, ssilenzi@sheintochtodd.com
- **ANTHONY ST. JOSEPH** anthony.stjoseph@usdoj.gov, mardella.suarez@usdoj.gov,CaseView.ECF@usdoj.gov
- **United States Trustee** USTPRegion03.PH.ECF@usdoj.gov

and via first class mail, postage prepaid, upon:

Finland Leasing Company  
P.O. Box 116  
Quakertown, PA 18951

Alcohol & Tobacco Tax & Trade Bureau  
Daniel Peralta  
Senior Counsel (Field Operations)  
1301 Clay Street, Suite 650N  
Oakland, CA 94612

Ally Bank, c/o AIS Portfolio Services, LP  
4515 N Santa Fe Ave., Dept. APS  
Oklahoma City, OK 73118

Commonwealth of Pennsylvania  
Department of Labor and Industry  
Collections Support Unit  
651 Boas Street, Room 925  
Harrisburg, PA 17121

Uline  
12575 Uline Drive  
Pleasant Prairie, WI 53158

Miller Coffey Tate LLP  
1628 JFK Blvd., Suite 950  
Philadelphia, PA 19103

Theodore J. Zeller, Esquire  
Norris McLaughlin  
515 West Hamilton Suite 502  
Allentown, PA 18101

Mike W. Bishop, Esquire  
Gray Reed  
1601 Elm Street, Suite 4600  
Dallas, TX 75201

Bonnie B. Finkel  
P.O. Box 1710  
Cherry Hill, NJ 08034

/s/ Joel L. Perrell, Jr.  
Joel L. Perrell, Jr.